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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

Mary Valdez,
Plaintiff,
v.
J.P.Morgan Chase Bank, N.A.,
Defendant.

Case No. 2:20-cv-02033-KJM-JDP

**SIXTH STIPULATION BETWEEN
JPMORGAN CHASE BANK, N.A.
AND MARY VALDEZ TO EXTEND
CHASE'S TIME TO RESPOND TO
THE COMPLAINT AND ORDER**

NEW RESPONSE DATE: May 21,
2021

1 Plaintiff Mary Valdez filed this action on October 12, 2020. Ms. Valdez
2 served Defendant JPMorgan Chase Bank, N.A. on October 13, 2020, making
3 Chase's response originally due on November 3, 2020. Based upon the allegations
4 in the Complaint, Chase requested and Ms. Valdez initially granted Chase until
5 December 1, 2020 to investigate the claims, evaluate early settlement, and
6 determine its response to the Complaint, and granted another extension to January
7 11, 2021, February 12, 2021, March 19, 2021 and again to April 19, 2021.

8 The parties have tentatively reached a settlement in the case that would
9 eliminate the need for further filings and Court proceedings if Chase has additional
10 time to respond to the Complaint. The parties are negotiating the language in a
11 settlement agreement and working through Plaintiff's questions and hope to have
12 that finalized soon.

13 The parties stipulate under Local Rule 144, with the Court's approval, that
14 Chase's time to respond to the Complaint is extended 32 days to May 21, 2021.
15 This is the sixth extension Ms. Valdez has granted to Chase. The extension will
16 not affect any other date in the case, because the Court continued the Scheduling
17 Conference to May 20, 2021.

18 IT IS SO STIPULATED.

19 DATED: April 16, 2021

Respectfully submitted,
DAVIS WRIGHT TREMAINE LLP

21 By: /s/ Joseph E. Addiego III
22 Joseph E. Addiego III
23 Frederick A. Haist
24 Attorneys for JPMorgan Chase Bank,
N.A.

DATED: April 16, 2021

MARTIN & BONTRAGER, APC

By: /s/ G. Thomas Martin, III

G. Thomas Martin, III

Nicholas J. Bontrager


Attorneys for Mary Valdez

ORDER

The stipulated request to extend time is granted. Chase's time to respond to the Complaint is extended to May 21, 2021. This is the sixth extension of time. The court does not anticipate granting any further extensions absent a detailed showing of good cause.

IT IS SO ORDERED.

DATED: April 19, 2021.



CHIEF UNITED STATES DISTRICT JUDGE

DAVIS WRIGHT TREMAINE LLP